

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

Retail Access Optimization Initiative

Docket No. N2011-1

**Responses of National Association of Postmasters of the United States
Witness Rita Zilinski
To First Set of Interrogatories of the U.S. Postal Service
(USPS/NAPUS-T1-1 through 17)**

The National Association of Postmasters of the United States hereby files the responses of witness Rita Zilinski to the following interrogatories of the United States Postal Service, USPS/NAPUS-T1-1 through 17, filed on October 3, 2011.

Respectfully submitted,

/s/

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USPS/NAPUS-T1-1. Your testimony states that you were “always extremely concerned about the security and safety of our mail.” Your testimony also states that “the Postal Service has a responsibility to protect the integrity of the mail; the closure of a post office can very well jeopardize the confidence in security, particularly in rural areas.” To the extent that you contend that Neighborhood Delivery Collection Box Units (NDCBUs) and unlocked curbside mailboxes are not safe, please provide the basis for this contention in the areas outside of the communities where you served in an employment capacity with the Postal Service. Please provide any documents you relied upon in support of this general assertion.

Answer. I am providing my real-life work experience; as such, my familiarity is limited to my own state, so I am unable to speak with authority about other communities. The Postal Service may wish to communicate with managers-in-charge and local officials of other small towns and rural communities relating their concerns about mail security.

USPS/NAPUS-T1-2. Your testimony states that you were “always extremely concerned about the security and safety of our mail.” Your testimony also states that “the Postal Service has a responsibility to protect the integrity of the mail; the closure of a post office can very well jeopardize the confidence in security, particularly in rural areas.” Do you know or have personal knowledge of the percentage of rural customers who are serviced through the following:

- (a) curbside boxes,
- (b) NDCBUs,
- (c) other centralized delivery or
- (d) some other type of delivery?

Answer. No.

USPS/NAPUS-T1-3. Your testimony states that “In weather impacted areas, ..., NDCBU boxes easily freeze in the winter, making it virtually impossible to open.” Your testimony also states that “carriers often inadvertently damage the boxes when using hammers to loosen the ice from around the doors so they can deliver the mail.” Please provide any documents you relied upon in support of the portion of your testimony quoted above for all of the areas outside of the communities you served in an employment capacity with the Postal Service.

Answer. I do not have in my possession such documents. I can only relate statements made to me, as Postmaster, from carriers who have used a hammer to break the ice from the mailboxes.

USPS/NAPUS-T1-4. Please describe the following:

- (a) the research you conducted on NDCBUs before finalizing your written testimony, and
- (b) your understanding of NDCBUs and what their current use is by the Postal Service.

Answer.

(a) I have not conducted research on NDCBUs. I am only testifying as to my personal experience as a Postmaster.

(b) I can only provide insight regarding the NDCBUs that were used by postal customers in the areas that I served.

USPS/NAPUS-T1-5. Please describe your understanding of the “Rev E” Cluster Box Unit and identify or describe its current use is by the Postal Service.

Answer. I do not have an understanding of the Rev E Cluster Box Unit use and their deployment. I understand that approved collection box units (CBUs) are being used in new developments and as replacements for NDCBUs. However, as Postmaster, I do not believe that there is a major distinction, other than the acronym, between NDCBUs and CBUs. Each one of the postal structures share the dominant characteristic of being a freestanding, joined group of mailboxes located in the public domain or in a common outdoor area.

USPS/NAPUS-T1-6. Please describe your understanding of the “Rev F” Cluster Box Unit and identify or describe its current use is by the Postal Service.

Answer. Same answer as T1-5.

USPS/NAPUS-T1-7. Your testimony states that “Closing a post office forces postal customers to receive their mail through ... a neighborhood delivery collection box unit.”

(a) Please confirm whether NDCBUs serve as authorized mail receptacles for new delivery or as replacement pieces.

(b) If part (a) is not confirmed, when were NDCBUs discontinued for new delivery or replacement pieces?

(c) Do you know the difference between a “Rev F” Cluster Box Unit and NDCBUs?

(d) If the answer to part (c) is affirmative, please describe all differences of which you are aware between the “Rev F” Cluster Box Unit and NDCBUs.

(e) Do you know whether any outdoor centralized delivery that would be implemented as a result of the RAO Initiative would not be a NDCBU, but a “Rev F” Cluster Box Unit?

Answer.

(a) Please refer to T1-5.

(b) I do not know that date.

(c) No

(d) The answer to (c) was no.

(e) No.

USPS/NAPUS-T1-8. Your testimony states that “[i]n weather impacted areas, ..., NDCBU boxes easily freeze in the winter, making it virtually impossible to open.”

(a) Please provide any documents you relied upon which would support this claim.

(b) To the extent that you contend that there is the existence of systemic freezing lock issues associated with the "Standard" or "Modified" Arrow lock, please provide the basis for this contention in the areas outside of the communities where you served in an employment capacity with the Postal Service. Please provide any documents you relied upon in support of this general assertion.

Answer.

(a) I have relied on the reports from my carriers.

(b) I can only provide information about the communities that I served as Postmaster.

USPS/NAPUS-T1-9. Does your testimony account for the fact that if a Village Post Office is established in a community with the availability of interior space, the Postal Service would not use a “Rev F” Cluster Box Unit in an exterior location, but a Rotary Cabinet or USPS-Std-4C?

Answer. If a location for a “Village Post Office” were to be available, yes.

USPS/NAPUS-T1-10. Based on your training as a security control officer, as described in your testimony, please explain the design and performance differences between the “Rev E” Cluster Box Units, Neighborhood Delivery Collection Box Units and “Rev F” Cluster Box Units? Please provide any documents you relied upon in support of this explanation.

Answer. I cannot explain the design and performance differences between the referenced mail receptacles. Please refer to T1-5.

USPS/NAPUS-T1-11. Your testimony also states that “carriers often inadvertently damage the boxes when using hammers to loosen the ice from around the doors so they can deliver the mail.”

(a) What is the extent of damage you would permit as a postmaster to Postal Service property before filing an accident report? Please provide documents in support of your response.

(b) What training do you have in strength of materials?

Answer.

(a) I have always filed a report, if any damage was done to postal property. The chipping of ices on locks and curbside boxes was not on postal property.

(b) None.

USPS/NAPUS-T1-12. Your testimony states that you were “always extremely concerned about the security and safety of our mail.” Your testimony also states that “the Postal Service has a responsibility to protect the integrity of the mail; the closure of a post office can very well jeopardize the confidence in security, particularly in rural areas.”

(a) Please provide any documents you relied upon in support of your assertions.

(b) Before finalizing your written testimony, did you review the Postal Service’s institutional response to PR/USPS-17?

(c) During your Postal career, what, if any, initiatives/actions did you propose to specifically address issues surrounding NDCBU/Cluster Box Unit security and what were the results in the communities where you served? Please provide documents in support of your response.

(d) How many reports (by year) did you make of vandalism/theft of NDCBUs, Mailboxes, etc. in your postal career? When and to whom were these reports transmitted? Please provide copies of any such reports.

(e) How many reports (by year) did you make of inoperability of NDCBUs, Mailboxes, etc. in your postal career? When and to whom were these reports transmitted? Please provide copies of any such reports.

(f) Describe your familiarity with data and statistics on the number of Volume Mail Attacks (VMA) to High Security Cluster Box Units, Cluster Box Units, and NDCBUs over the past three fiscal years.

Answer.

(a) I do not have any documents. I am providing the insight of someone that has served a rural community.

(b) No.

(c) I have suggested that the owners of the boxes construct a roof, a back and two sides around the boxes. I do not have documentation.

(d) None

(e) I do not recall how many times I filed reports, but when they were filed they were submitted to Eastern Area Facilities for repairs.

(f) I do not have familiarity with the data and statistics referenced.

USPS/NAPUS-T1-13. Your testimony states that in communities you served, “mailboxes were destroyed and mail was scattered throughout the roadway.”

(a) Did you consult any law enforcement statistics or records before making this assertion? If so, please provide those records that you reviewed.

(b) Do you know how many complaints are recorded in the financial crimes database for NDCBUs in West Virginia for any given recent fiscal year?

(c) What actions, if any, did you take as a postmaster to address these incidents as they occurred? Did you file any reports of mailboxes being destroyed?

When and to whom were these reports transmitted? Please provide copies of any such reports.

(a) No

(b) No.

(c) I do not have in possession the requested documents. The reports were filed with the sheriff’s department and the West Virginia State Police. The reports should be at the post offices and with the referenced law enforcement officials.

USPS/NAPUS-T1-14. Your testimony states that “most of the time, nothing is done when vandalizing is reported, except the filing of a report.”

(a) Did you ever decide not to report incidents of vandalism? If so, how many times did you do so? Please explain the circumstances of each such occurrence.

(b) Did you consult any law enforcement statistics or records before making this assertion? If so, please provide those records that you reviewed.

Answer.

(a) No.

(b) No.

USPS/NAPUS-T1-15. Your testimony states that “This past year, mail was removed from a mailbox; a customer had placed five pieces of out going mail in the box. The thieves defaced the checks and cashed them at two businesses. When this occurred, it was the customer’s responsibility to contact the sheriff’s department and report the damage. A person was arrested for the crime, although most of the time, nothing is done when vandalizing is reported, except the filing of a report.”

- (a) Do you have personal knowledge of this incident?
- (b) Were you notified of this incident shortly after it occurred?
- (c) What is the relationship of the victim to you?
- (d) Did you make any recommendations to the victim as to where to report the incident? If so, what did you recommend?
- (e) Did you file any reports to law enforcement regarding this incident?
- (f) Please identify the facts, dates, and circumstances for each instance when you reported vandalism in the communities where you served and nothing was done outside the filing of a report?

Answer.

- (a) Yes.
- (b) Yes.
- (c) The victim was a customer of a neighboring post office, Cool Ridge, where I was working. The customer came to the post office with the paperwork for the postal inspectors. A resident of the town of Ghent went to prison for the crime.
- (d) No.
- (e) No.
- (f) I cannot recall the dates of all the reports. Records should be available at the local post offices. I reported the incidents to the local sheriff’s department regarding numerous boxes that were beaten with a baseball bat. A few days later, I reported the names of the boys and the school the boys attended. Also, I remember that, in 2010, I reported to the Postmaster that a person was going through the cluster of curbside mailboxes. The state police were contacted.

USPS/NAPUS-T1-16. Your testimony states “customers move there [sic] mail from highway contract mail boxes to a Post Office Box because their box had been destroyed and mail continually damaged.” Did you consult any USPS delivery statistics or records before making this assertion? If so, please provide those records that you reviewed.

Answer. No.

USPS/NAPUS-T1-17.

(a) Before finalizing your testimony, did you review the Office of Inspector General Audit Report - Modes of Delivery, Report Number DR-AR-11-006?

(b) If the answer to part (a) is affirmative, please confirm that that report concludes that centralized delivery is more cost effective and efficient than door-to-door or curbside delivery because carriers deliver mail to a group or cluster of mail receptacles at one delivery point.

Answer. No.